

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

DAVID KRAMER, Individually, and as the)
President and Sole Owner of CERTIFIED CAR)
SALES, LLC., a Missouri Limited Liability)
Company,) Case No. 08 CV 2530
Plaintiff,)
v.) Judge Castillo
Sheriff's Deputy STEVEN STELTER;) Magistrate Judge Keys
Individually and as a Deputy of the DuPage County)
Sheriff's Office; JOHN P. CREEDON, Individually)
and as Director of the Tri-County Auto Theft Unit;)
MICHAEL J. COLANDO, deceased, Individually)
and as a member of the PUGI KIA, LLC and as)
the President and sole owner of D&M AUTO)
SALES, INC.; DOMINIC A. PUGLIANI,)
Individually, and as a member of the PUGI KIA,)
LLC; LARRY M. HALL, Individually, and as a)
Manager of the PUGI KIA, LLC.; ANTHONY)
J. COLANDO, Jr., Individually, and as a)
Manager of the PUGI KIA, LLC; ANTHONY)
J. COLANDO, Sr., not individually, but as named)
executor in his capacity as executor of the estate)
of MICHAEL J. COLANDO, deceased; DOMINIC)
MANCINI, Individually and as an attorney; PUGI)
KIA, LLC; D & M AUTO SALES, INC.; KIA)
MOTORS AMERICA, INC.; VW CREDIT, INC.,)
Defendants.)

**DEFENDANTS ANTHONY J. COLANDO, SR. AND D & M AUTO SALES INC.'S
MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD**

Defendants ANTHONY J. COLANDO, SR., not individually but as named executor of
the estate of MICHAEL J. COLANDO, and D & M AUTO SALES, INC., by their attorneys
JAMES J. ROCHE & ASSOCIATES, respectfully move this Court for a 45 day extension of
time to answer or otherwise plead to the Complaint. In support of their Motion, the above named

Defendants state as follows:

1. Plaintiff's Complaint in this case was filed on May 2, 2008.
2. The law firm of JAMES J. ROCHE & ASSOCIATES was retained to represent the Defendants ANTHONY J. COLANDO, SR., not individually but as named executor of the estate of MICHAEL J. COLANDO, and D & M AUTO SALES, INC.
3. Appearances of behalf of the above named Defendants were filed by counsel on May 28, 2008.
4. Plaintiff's Complaint is over one hundred pages long, contains allegations against 12 defendants, and involves complex financial transactions.
5. Defendants need additional time to investigate the allegations of the Complaint before properly responding to it.
6. This motion is filed not to cause unnecessary delay, but to provide the Defendants with a reasonable time to answer or otherwise plead to this Complaint.

WHEREFORE, Defendants ANTHONY J. COLANDO, SR., not individually but as named executor of the estate of MICHAEL J. COLANDO, and D & M AUTO SALES, INC., respectfully request that this Court grant their Motion and allow them to answer or otherwise plead to the Complaint within 45 days.

Respectfully submitted,

s/ Justyna A. Ziolo

One of the attorneys for ANTHONY J. COLANDO, SR., not individually but as named executor of the estate of MICHAEL J. COLANDO, and D & M AUTO SALES, INC.

Justyna A. Ziolo, ARDC#6280391
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CERTIFICATE OF SERVICE

I certify that on May 28th, 2008 I electronically filed Defendant ANTHONY J. COLANDO, SR., not individually but as named executor of the estate of MICHAEL J. COLANDO, and D & M AUTO SALES, INC's Motion for Extension of Time to Answer of Otherwise Plead and Notice of Moiton with the Clerk of the Court for the United States District Court for the Northern District of Illinois, Eastern Division, using the CM/ECF system as to Filing Users.

Respectfully submitted,
JAMES J. ROCHE & ASSOCIATES

By: s/ Justyna A. Ziolo
One of the attorneys for ANTHONY J. COLANDO, SR., not individually but as named executor of the estate of MICHAEL J. COLANDO, and D & M AUTO SALES, INC.

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